

McCormick, Barstow, Sheppard,
Wayte & Carruth LLP
Frank A. Toddre, II
Nevada Bar No. 11474
frank.toddre@mccormickbarstow.com
Mandy Vogel
Nevada Bar No. 16150
mandy.vogel@mccormickbarstow.com
8337 West Sunset Road, Suite 350
Las Vegas, Nevada 89113
Telephone: (702) 949-1100
Facsimile: (702) 949-1101

*Attorneys for Defendants Renee Baker,
Tara Carpenter, Scott Davis, Marc La Fleur,
And Kim Thomas*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA, SOUTHERN DIVISION

SAID ELMAJZOUNB,

Plaintiff,

v.

SCOTT DAVIS, et al.,

Defendants.

Case No. 3:19-cv-00196-MMD-CSD

**STIPULATION AND ORDER TO
EXTEND THE DEADLINE FOR
DEFENDANTS TO FILE A RESPONSE
TO PLAINTIFF'S MOTION FOR
ATTORNEY FEES AND COSTS
(ECF NO. 111)**

Defendants, Renee Baker, Tara Carpenter, Scott Davis, Marc La Fleur, And Kim Thomas (collectively, "Defendants"), by and through their Associate Counsel, Frank Toddre II, Esq. and Mandy Vogel of the law firm McCormick, Barstow, Sheppard, Wayte, and Carruth, LLP, and Plaintiff, Said Elmajzoub, by and through his counsel, CAIR Legal Defense Fund, Gadeir I. Abbas, Lena F. Masri, Justin Sadowsky, and Allen Lichtenstein, respectfully submit the following Stipulation and Order to Extend the Deadline for Defendants to File a Response to Plaintiff's Motion for Attorney Fees and Costs (ECF No. 111)

This case is currently set for a settlement conference before Magistrate Judge Craig S. Denney on December 19, 2022, when Defendants' Response to Plaintiff's Motion for Attorney Fees and Costs (ECF No. 111) is also due.

///

1 The parties believe that it would be prudent to extend the deadline for Defendants to file a
 2 response to Plaintiff's Motion for Attorney Fees and Costs (ECF No. 111), as the parties may be
 3 able to settle the case at that time.

4 Defendants' Response to Plaintiff's Motion for Attorney Fees and Costs (ECF No. 111) is
 5 currently due on December 19, 2022. The parties request a one-week extension on the deadline,
 6 which would make the response due on or before December 27¹, 2022.

7 DATED: December 13, 2022

DATED: December 13, 2022

8 By: /s/ Justin Sadowsky

By: /s/ Frank A. Toddre, II

9 Lena Masri
 10 Gadeir I. Abbas
 11 Justin Sadowsky
 CAIR LEGAL DEFENSE FUND
 453 New Jersey Ave., SE
 Washington DC 20003

Frank A Toddre, II
 Nevada Bar No. 11474
 Mandy Vogel
 Nevada Bar No. 16150
 McCORMICK, BARSTOW, SHEPPARD,
 WAYTE & CARRUTH LLP
 8337 W. Sunset Rd., Ste. 350
 Las Vegas, NV 89113
 Attorneys for Defendants Renee Baker,
 Tara Carpenter, Scott Davis, Marc La Fleur,
 And Kim Thomas

12 Allen Lichtenstein
 13 3315 Russell Rd., No. 222
 Las Vegas, NV 89120
 14 Attorneys for Plaintiff Said Elmajzoub

15
 16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///


24 ///

25 ///

26
 27 ¹ One-week extension would make the response due on December 26, 2022, but it is the parties'
 28 understanding that the U.S. District Court for the District of Nevada will be closed on December
 26, 2022 in observance of the Christmas holiday.

1 Based on the foregoing stipulation of the parties, **IT IS ORDERED** that the deadline for
2 Defendants to file a response to Plaintiff's Motion for Attorney Fees and Costs (ECF No. 111) is
3 due on or before December 27, 2022. **IT IS FURTHER ORDERED** that Plaintiff's Reply to
4 Defendants' Response to Plaintiff's Motion for Attorney Fees and Costs (ECF No. 111), if any, is
5 due seven days after service of Defendants' response.

6
7 **IT IS SO ORDERED:**

8 

9
10 Chief U.S. District Judge

11 **DATED** this 14th day of December, 2022

12
13
14
15
16 8799611.1